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28 **UNITED STATES DISTRICT COURT**
1 **NORTHERN DISTRICT OF CALIFORNIA**
2 **OAKLAND DIVISION**

3 IN RE PLUM BABY FOOD LITIGATION

4 Case No. 4:21-cv-00913-YGR

5 This Document Relates To: ALL ACTIONS

6 Hon. Yvonne Gonzalez Rogers

7 **STIPULATED REQUEST AND**
8 **[PROPOSED] ORDER TO EXTEND**
9 **EXPERT DISCOVERY DEADLINES**

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Sarah Brown, Josh Crawford, Jessica David,
2 Autumn Ellison, Ludmila Gulkarov, Vanessa Mathiesen, Kelly McKeon, Tommy Nurre, and
3 Janine Torrence (“Plaintiffs”) and Defendant Plum, PBC (“Plum”) (collectively, the “Parties”)
4 respectfully submit this stipulated request to extend the deadline for Defendant’s expert disclosures
5 regarding class certification to March 9, 2023, and to extend the expert discovery cutoff date to
6 March 31, 2023.

7 **STIPULATION**

8 **WHEREAS**, on October 11, 2022, this Court issued a modified case schedule (ECF No.
9 164) granting the Parties’ stipulated request to extend all deadlines in the case schedule by 60-days,
10 which set the deadline for Plaintiffs’ expert disclosures to December 20, 2022, Defendant’s expert
11 disclosures to February 14, 2023, and the expert discovery cutoff date to March 28, 2023;

12 **WHEREAS**, on December 20, 2022, Plaintiffs disclosed numerous experts;

13 **WHEREAS**, the Parties, through their respective counsel, have met and conferred
14 regarding the upcoming deadlines related to Defendant’s expert disclosures and the expert
15 discovery cutoff date;

16 **WHEREAS**, the Parties have been engaging and are continuing to engage in expert
17 discovery related to Plaintiffs’ experts, including the scheduling and taking of Plaintiffs’ expert
18 depositions, and the Parties agree to providing additional time to continue to conduct such
19 discovery prior to Defendant’s expert disclosures and, therefore, request a twenty-three (23) day
20 extension of the deadline for Defendant’s expert disclosures and a three-day extension of the expert
21 discovery cutoff date;

22 **WHEREAS**, this is the third modification to the case schedule. On July 21, 2022, the Court
23 granted the Parties’ Stipulated Request to Extend the Deadline to Complete Mediation, from July
24 29, 2022, to August 22, 2022 (ECF No. 150) and on October 11, 2022, the Court granted the Parties’
25 Stipulated Request to Modify Case Schedule, from October 6, 2022 (ECF No. 163);

26 **WHEREAS**, this requested extension is not made for the purpose of delay, promotes
27 judicial efficiency, and will not cause prejudice to the respective Parties;

1 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between the Parties,
2 through their respective counsel and respectfully requested that the Court extend the deadlines for
3 Defendant's expert disclosures to March 9, 2023, and the expert discovery cutoff date to March 31,
4 2023.

5
6 STIPULATED TO AND DATED this 17th day of January 2023.

7 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

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CERTIFICATION OF COMPLIANCE WITH N.D. Cal. L.R. 5-1(i)(3)

I hereby certify that pursuant to N.D. Cal. L.R. 5-1(i)(3), I have obtained the authorization from the above signatories to file the above-referenced document, and that the above signatories concur in the filing's content.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 17, 2023

By: David Biderman

David Biderman

[PROPOSED] ORDER

Pursuant to the stipulation of the Parties hereto, the Court GRANTS the Parties' request and AMENDS the deadlines for both Defendant's expert disclosures to March 9, 2023, an additional twenty-three (23) days, and the expert discovery cutoff date to March 31, 2023, an additional three days.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 24, 2023

Yvonne Gonzalez Rogers
HONORABLE YVONNE GONZALEZ ROGERS
U.S. DISTRICT COURT JUDGE